

BLUMENTHAL, NORDREHAUG & BHOWMIK
Norman B. Blumenthal (State Bar No. 068687)
Kyle R. Nordrehaug (State Bar No. 205975)
Aparajit Bhomik (State Bar No. 248066)
Piya Mukherjee (State Bar No. 274217)
225 Calle Clara
La Jolla, CA 92037

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CATHERINE VALLE and DON
PEROLINO CRISTOBAL, individuals, on
behalf of themselves and all persons
similarly situated,

Plaintiffs,

v.

LOWE'S HIW, INC.;

Defendant.

Case No. CV 11-1489 SC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR DISMISSAL**

IT IS HEREBY STIPULATED by and between the parties to this action through their
designated counsel as follows:

1. The Parties agree that the action should be reopened so it can be formally
dismissed pursuant to Federal Rule of Civil Procedure 41(a)(A)(ii) as follows:

a. All individual claims brought herein by plaintiffs CATHERINE
VALLE AND DON PEROLINO CRISTOBAL ("Plaintiffs") on their own respective
behalfes against Defendant LOWE'S HIW, INC. ("Defendant") are dismissed *with*

1 prejudice, each side to bear its own costs and attorneys' fees.

2 b. All claims brought herein on behalf of others besides Plaintiffs,
3 including the claims brought on behalf of the putative class and the claims of the State
4 of California, Labor Workforce Development Agency against Defendant are dismissed
5 without prejudice, each side to bear its own costs and attorneys' fees.
6

7 DATED: July 26, 2013

BLUMENTHAL, NORDREHAUG &
BHOWMIK

8
9
10 By: /s/ Aparajit Bhowmik
11 Aparajit Bhowmik
12 Attorneys for Plaintiffs

13 DATED: July 26, 2013

HUNTON & WILLIAMS

14
15 By: /s/ Jason Kim
16 Jason Kim
17 Attorneys for Defendant

18 **IT IS SO ORDERED**

19 DATED: 07/29/2013
20

